

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: TESTOSTERONE REPLACEMENT
THERAPY PRODUCTS LIABILITY
LITIGATION

This Document Relates to: All cases against
AbbVie Inc. and Abbott Laboratories

MDL No. 2545

Case No. 1:14-cv-01748

Honorable Matthew F. Kennelly

**ABBVIE'S AND ABBOTT LABORATORIES' AGREED MOTION
FOR AN EXTENSION OF TIME TO SERVE INITIAL DISCLOSURES**

Defendants AbbVie and Abbott Laboratories, by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b), respectfully request an extension of time to serve the disclosures required by Case Management Order No. 7. (Dkt. No. 346 at 2-3.) In support of this agreed motion, Defendants state as follows:

1. On August 25, 2014, the Court entered Case Management Order No. 7, in which it ordered Defendants to serve initial disclosures on Plaintiffs' Co-Lead Counsel within 45 days of the entry of that order. (Dkt. No. 346 at 2-3.) The due date for these disclosures is October 9.
2. Defendants submit that they require additional time to complete their investigation for the disclosures, and therefore request a 7-day extension. AbbVie's and Abbott Laboratories' disclosures would be due on October 16.
3. This request is not made for the purpose of unnecessary delay.
4. On October 8, 2014, counsel for Defendants contacted Trent Miracle, Plaintiffs' Co-Lead Counsel, who stated that Plaintiffs agree to the relief requested herein.

WHEREFORE, Defendants respectfully request that the Court extend the deadline for their initial disclosures to October 16, 2014.

Dated: October 9, 2014

Respectfully submitted,

WINSTON & STRAWN LLP

By: /s/ Scott P. Glauberman
James F. Hurst
Scott P. Glauberman
Nicole E. Wrigley
Bryna J. Dahlin
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, Illinois 60601
Tel: (312) 558-5600
Fax: (312) 558-5700
sglauberman@winston.com
jhurst@winston.com
nwright@winston.com
bdahlin@winston.com

Attorneys for AbbVie Inc. and Abbott Laboratories

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served via CM/ECF on October 9, 2014, upon all counsel of record.

/s/ Scott Ahmad
Scott Ahmad